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*A Delaware Limited Liability Partnership*

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*Counsel for Reading Rock Northeast LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

READING ROCK NORTHEAST, LLC,

Plaintiff,

v.

WILLIAM N. RUSSELL III *et al.*

Defendants.

Civil Action No. 1:20-CV-5728

**NOTICE OF MOTION FOR AN ORDER  
GRANTING THE *PRO HAC VICE*  
ADMISSION OF JEFFREY M. NYE**

TO: Denis P. McBride, Esq. and John P. Shea, Esq.  
1040 Kings Highway N., Ste. 600  
Cherry Hill, NJ 08034  
Counsel for Defendants William N. Russell III *and* Russell Cast Stone, Inc.

**PLEASE TAKE NOTICE** that, pursuant to Local Rule 101.1(c), the undersigned attorneys for Plaintiff, Reading Rock Northeast, LLC, move before this Court for an Order granting

the *pro hac vice* admission of Jeffrey M. Nye, Esq., on behalf of Plaintiff, in association with the undersigned New Jersey counsel; and

**PLEASE TAKE FURTHER NOTICE** that, in support of its motion, Plaintiff relies upon the accompanying Certifications of Jeffrey M. Nye , Esq., and Patrick J. Kearney, Esq.; and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Respectfully submitted,

/s/ Patrick J. Kearney  
Patrick J. Kearney, Esquire

Dated: July 20, 2020